UNITED STATES DISTRICT COURT DISTRICT OF MINNESOTA

INDICTMENT CR10-295 ADM/SRN UNITED STATES OF AMERICA, Plaintiff, (18 U.S.C. § 2) (18 U.S.C. § 922(g)(1)) (18 U.S.C. § 924(a)(2)) v.) (18 U.S.C. § 924(d)(1)) (1) DEREK WAYNE BROWN,) (21 U.S.C. § 841(a)(1)) a/k/a DB,) (21 U.S.C. § 841(b)(1)(B)) (21 U.S.C. § 846) a/k/a Southside, (21 U.S.C. § 853) (2) ROBERT BRANDON COOK, (28 U.S.C. § 2461(c)) a/k/a Black, (3) LEVERETTE CUSHAWN CARGILL, a/k/a Bud, (4) CARL MAURICE WOODARD, a/k/a CW, a/k/a C Rock, (5) LANESTA JEAN WHITE, a/k/a Nessie, (6) TIFFANY TYEISHA DANTZLER, (7) ORLANDO MICHAEL JRAVHA WALKER,) a/k/a Doe, a/k/a Doeski, (8) VICTOR CORTEZ SHELTON, a/k/a Cord Lord, a/k/a Cort Lord, and (9) SHILA MARIE ROBINSON, Defendants.

THE UNITED STATES GRAND JURY CHARGES THAT:

COUNT 1

(Conspiracy to Possess with Intent to Distribute Cocaine Base)

From in or about November 20, 2009, and continuing through on or about July 2010, in the State and District of Minnesota, the defendants,

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U.S. DISTRICT COURT ST. PAUL



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DEREK WAYNE BROWN,

a/k/a DB,

a/k/a Southside,

ROBERT BRANDON COOK,

a/k/a Black,

LEVERETTE CUSHAWN CARGILL,

a/k/a Bud,

CARL MAURICE WOODARD,

a/k/a CW,

a/k/a C Rock,

LANESTA JEAN WHITE,

a/k/a Nessie, and

TIFFANY TYEISHA DANTZLER,

did unlawfully, knowingly and intentionally conspire with each other and with other persons known and unknown to the Grand Jury, to possess with intent to distribute 28 grams or more of a mixture and substance containing cocaine base ("crack"), a controlled substance, in violation of Title 21, United States Code, Sections 841(a)(1), 841(b)(1)(B) and 846.

COUNT 2

(Felon in Possession of a Firearm)

On or about November 20, 2009, in the State and District of Minnesota, the defendant,

ROBERT BRANDON COOK, a/k/a Black,

having previously been convicted on or about August 10, 1999, of Third Degree Sale of Narcotics in Ramsey County, Minnesota, a crime punishable by imprisonment for a term exceeding one year, did knowingly possess, in and affecting interstate commerce, a firearm, namely, a Masterpiece Arms, 9mm pistol, serial number F6763, all in

violation of Title 18, United States Code, Sections 922(g)(1) and 924(a)(2).

COUNT 3

(Aiding and Abetting Felon in Possession of a Firearm)

On or about April 23, 2010, in the State and District of Minnesota, the defendants,

ORLANDO MICHAEL JRAVHA WALKER,

a/k/a Doe,
a/k/a Doeski, and
VICTOR CORTEZ SHELTON,
a/k/a Cord Lord,
a/k/a Cort Lord,

aiding and abetting each other and having previously been convicted of the following crimes punishable by imprisonment for a term exceeding one year,

Defendant	Date	Offense	Offense Location
Walker	7-19-2004	Prohibited Person in Possession of a Firearm	Hennepin County, MN
Shelton	10-29-2007	2nd Degree Assault	Stearns, County, MN

did knowingly possess, in and affecting interstate commerce, a firearm, namely, a Ruger P89, 9mm pistol, serial number 315-94095, all in violation of Title 18, United States Code, Sections 2, 922(g)(1) and 924(a)(2).

COUNT 4

(Aiding and Abetting Felon in Possession of Ammunition)

On or about May 20, 2010, in the State and District of Minnesota, the defendants,

ROBERT BRANDON COOK, a/k/a Black, and ORLANDO MICHAEL JRAVHA WALKER, a/k/a Doe, a/k/a Doeski,

aiding and abetting each other and having previously been convicted of the following crimes punishable by imprisonment for a term exceeding one year,

Defendant	Date	Offense	Offense Location
Cook	8-10-1999	3rd Degree Sale of Narcotics	Ramsey County, MN
Walker	7-19-2004	Prohibited Person in Possession of a Firearm	Hennepin County, MN

did knowingly possess, in and affecting interstate commerce, ammunition, namely, three rounds of REM-UMC 38 SPL bullets, all in violation of Title 18, United States Code, Sections 2, 922(g)(1) and 924(a)(2).

COUNT 5

(Aiding and Abetting Felon in Possession of A Firearm)

On or about June 19, 2010, in the State and District of Minnesota, the defendants,

aiding and abetting each other and having previously been convicted of the following crimes punishable by imprisonment for a term exceeding one year,

Defendant	Date	Offense	Offense Location
Walker	7-19-2004	Prohibited Person in Possession of a Firearm	Hennepin County, MN
Shelton	10-29-2007	2nd Degree Assault	Stearns, County, MN
Robinson	3-13-2009	Damage to Property	Stearns County, MN

did knowingly possess, in and affecting interstate commerce, a firearm, namely, a Mossberg Model 500A 12 gauge shotgun, serial number K576609, all in violation of Title 18, United States Code, Sections 2, 922(g)(1) and 924(a)(2).

FORFEITURE ALLEGATION

Counts 1 through 5 of this Indictment are hereby realleged and incorporated as if fully set forth herein by reference, for the purpose of alleging forfeitures pursuant to Title 18, United States Code, Section 924(d)(1), Title 21, United

States Code, Section 853, and Title 28, United States Code, Section 2461(c).

If convicted of Count 1 of this Indictment, the defendants shall forfeit to the United States pursuant to Title 21, United States Code, Section 853(a)(1) and (2), any and all property constituting, or derived from, any proceeds the defendants obtained directly or indirectly as a result of said violations, and any and all property used, or intended to be used, in any manner or part to commit or to facilitate the commission of said violations.

If convicted of Counts 2 through 5 of this Indictment, the defendant shall forfeit to the United States pursuant to Title 18, United States Code, Section 924(d)(1), any firearm with accessories or any ammunition involved in or used in any knowing violation of sections 922(g)(1) and 924(a)(2), including a Masterpiece Arms, 9mm pistol, serial number F6763, a Ruger P89, 9mm pistol, serial number 315-94095, three rounds of REM-UMC 38 SPL bullets, and a Mossberg Model 500A 12 gauge shotgun, serial number K576609.

If any of the above-described forfeitable property is unavailable for forfeiture, the United States intends to seek the forfeiture of substitute property as provided for in Title 21, United States Code, Section 853(p).

All in violation of Title 18, United States Code, Sections 922(g)(1), 924(a)(2) and 924(d)(1); Title 21, United States Code,

Sections 841(a)(1), 841(b)(1)(B), 846 and 853(a); and Title 28, United States Code, Section 2461(c).

A TRUE BILL

UNITED STATES ATTORNEY FOREPERSON